March 5, 2018

VIA ECF

Honorable Debra Freeman
United States District Court
for the Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl St.
New York, NY 10007

Re: SEC v. Rio Tinto PLC, et al., No. 17-cv-7994 (AT) (DCF)

Dear Judge Freeman:

The parties have conferred and agree that good cause exists for the entry of a protective order. As further explained in the proposed Protective Order, attached hereto as Exhibit A, discovery will involve the production of a variety of confidential documents, including personal and proprietary information. Accordingly, the parties jointly request that this Court enter the proposed protective order. Thank you in advance for the Court's consideration of this submission.

Respectfully Submitted,

Jennifer L. Conn

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cc: Counsel of Record (via ECF)